

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

No. 2:21-cv-00563-JNW

**DECLARATION OF RAKESH N. KILARU
IN SUPPORT OF DEFENDANT VALVE
CORPORATION'S MOTION TO DISMISS
CONSUMER COMPLAINT**

I, Rakesh N. Kilaru, declare and state as follows:

1. I am an attorney representing Valve Corporation in the above-captioned matter. I am over the age of 18, competent to testify, and I make this declaration of my own personal knowledge.

2. A true and correct copy of Emails among David Friedman, Caroline Li, and Robert Cobbs, dated between August 8, 2025 and August 18, 2025, is attached hereto as **Exhibit 1**.

3. A true and correct copy of an Email sent from Richard Simins to Steve Berman and William Bucher, dated September 25, 2024, is attached hereto as **Exhibit 2**.

4. In compliance with the Court's Chambers Procedures, the parties have met and conferred to determine whether the issues raised in Valve's motion to dismiss can be resolved by Plaintiffs filing an amended complaint. Plaintiffs took the position that they need not amend their

1 complaint in light of the defects Valve has identified, necessitating the filing of Valve's motion to
2 dismiss.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is
4 true and correct.

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6 EXECUTED on this 22nd day of August, 2025 in Washington, D.C.

7 s/ Rakesh N. Kilaru
8 Rakesh N. Kilaru
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